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22  
 13 UNITED STATES DISTRICT COURT  
 14 NORTHERN DISTRICT OF CALIFORNIA  
 15 SAN FRANCISCO DIVISION

26 NATIONAL TPS ALLIANCE, MARIELA  
 27 GONZÁLEZ, FREDDY JOSE ARAPE RIVAS,  
 28 M.H., CECILIA DANIELA GONZÁLEZ  
 1 HERRERA, ALBA CECILIA PURICA  
 2 HERNÁNDEZ, E.R., HENDRINA VIVAS  
 3 CASTILLO, A.C.A., SHERIKA BLANC, VILES  
 4 DORSAINVIL, and G.S.,

5 Plaintiffs,

6 vs.

7 KRISTI NOEM, in her official capacity as  
 8 Secretary of Homeland Security, UNITED  
 9 STATES DEPARTMENT OF HOMELAND  
 10 SECURITY, and UNITED STATES OF  
 11 AMERICA,

12 Defendants.

13 Case No. 3:25-cv-01766-EMC

14 **DECLARATION OF MARCELA VILLEDA  
 15 SANCHINELLI IN SUPPORT OF  
 16 SUPPLEMENT TO MOTION FOR  
 17 COMPLIANCE [ECF 286]**

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1                   **DECLARATION OF MARCELA VILLEDA SANCHINELLI**

2 I, Marcela Villeda Sanchinelli, hereby declare:

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4     1. I am over the age of eighteen, and I am competent to make this declaration. I  
5       provide this declaration based upon my personal knowledge. If called as a witness, I  
6       would and could competently testify to the facts stated herein.

7     2. I am an attorney at Grossman Young & Hammond, an internationally ranked top  
8       immigration law firm based in Bethesda, Maryland.

9     3. Grossman Young & Hammond's clients include numerous Venezuelan TPS  
10      holders.

11    4. Following the September 5, 2025 ruling in *National TPS Alliance v. Noem*, Case  
12      No. 25-cv-01766-EMC, my colleagues and I have been working to assist our  
13      Venezuelan TPS holder clients to re-register to extend their TPS through October 2,  
14      2026, pursuant to the January 17, 2025 extension.

15    5. On Monday and Tuesday of this week, I and other colleagues were able to use our  
16      online USCIS accounts to prepare and save draft TPS re-registration applications  
17      (Form I-821) for our Venezuelan TPS holder clients.

18    6. However, this morning, when I and another colleague logged into our USCIS  
19      accounts and attempted to submit those saved applications, we received error  
20      messages instructing us to check the "Getting Started" portion of the online  
21      application. This section contains the question, "What is the name of the designated  
22      TPS country under which you are applying?" with a drop down menu listing TPS-  
23      designated countries. Whereas before, registrants could select Venezuela, as of this  
24      morning, that option no longer appears.

25    7. This revision has frustrated my office's efforts to complete online re-registration  
26      applications for our Venezuelan TPS holder clients by the September 10, 2025  
27      deadline.

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1 I declare under penalty of perjury that the foregoing is true and correct, and that this  
2 declaration was executed at Fairfax, Virginia this 10th day of September, 2025.

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5 Marcela Villeda Sanchinelli  
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